

From: [Quinones, Edwin](#)
To: [Brown, Cynthia](#); [Josiam, Raji](#); [Adams, Adam](#)
Cc: [Johnson, Lydia](#); [Banipal, Ben](#); [Sanchez, Carlos](#)
Subject: FW: USOR - Good Faith Offer (400 N. Richey) - Settlement Discussions
Date: Tuesday, June 04, 2013 2:12:16 PM
Attachments: [Good Faith Letter.pdf](#)
[SP-#4881941-v1-Attachment A to Good Faith Offer letter 5 28 13.DOC](#)
[SP-#4870399-v3-USOR - Operable Unit \(400 N Richey\) AOC \(revised version....doc](#)
[SP-#4886433-v1-Appendix A-1 \(AOCs\).doc](#)
[Order for Appointment of Receiver and Master.pdf](#)
[SP-#4882248-v1-Statement of Work \(SOW\) OU1.docx](#)
[SP-#4886665-v1-Redline - Statement of Work \(Unit 1\) \(400 N Richey\) .docx](#)
[SP-#4885716-v1-Redline \(400 N Richey\) \(5 28 13\) .doc](#)

FYI – This is the good faith offer sent by the PRP Group for the 400 N. Richey property. Of note, it includes language classifying a subgroup of de minimis PRPs within their group and a provision requiring them to complete certain removal actions under the 8/25/11 AOC prior to commencing RI/FS work. We need to discuss before I meet with them, which will probably be sometime next week.

Raji – please take a look at their comments in the SOW and Work to Be Performed Section of the AOC to make sure it coincides with your technical negotiations.

From: Westfall, Constance [mailto:Connie.Westfall@strasburger.com]
Sent: Tuesday, May 28, 2013 6:51 PM
To: Quinones, Edwin
Cc: Koks, Mary; Chintan Amin; Robert Lockemer; Patrick Gobb; Eric Pastor
Subject: USOR - Good Faith Offer (400 N. Richey) - Settlement Discussions

Ed:

I am glad that you received our good faith offer package earlier today by hand-delivery. You have requested that we provide you with an electronic copy of the materials. To minimize confusion, the attachments to this e-mail deal with 400 N. Richey. By separate e-mail, I will send you the electronic version of the 200 N. Richey materials.

Specifically, attached are:

- (1) Good Faith Offer Letter;
- (2) Attachment A to (1);
- (3) "Clean" version of Order for 400 N. Richey;
- (4) Attachment A-1 to (3);
- (5) "Clean" version of Statement of Work for 400 N. Richey, attachment to (3);
- (6) Order for Appointment of Receiver, attachment to (3);
- (7) Red-line of (3); and
- (8) Red-line of (5).

You and I discussed having a negotiation session within the next couple of weeks. I would suggest that we go ahead and set a date for this meeting since we are headed into summer.

Please let me or Mary know if you have any questions.

Thanks,

Connie



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